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14 Church of Scientology of California

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES

17 CHURCH OF SCIENTOLOGY OF CALIFORNIA,)
18)
19 Plaintiff,)

20 vs.)

21 GERALD ARMSTRONG, DOES 1 THROUGH)
22 10, INCLUSIVE)
23 Defendants.)

24 MARY SUE HUBBARD,)
25)
26 Intervenor.)

27 GERALD ARMSTRONG,)
28 Cross-Complainant,)

vs.)

CHURCH OF SCIENTOLOGY OF CALIFORNIA,)
a California corporation, et al.,)
Cross-Defendants.)

Case No. C 420 153

DECLARATION OF
KENNETH D. LONG IN
SUPPORT OF OPPOSITION
TO MOTION FOR
RETURN OF DOCUMENTS

Date: Feb. 21, 1989
Time: 9:00 a.m.
Dept: 56

I, KENNETH D. LONG, declare as follows:

1. I am employed as a paralegal in the Legal Division of the Church of Scientology of California (hereinafter "CSC"), and have been involved since August 1982 in almost every aspect of

1 the litigation between Gerald Armstrong and CSC.

2 2. On December 16, 1986, I accompanied CSC counsel John G.
3 Peterson to the Los Angeles Superior Court where we met with Ms.
4 Rosie Hart, clerk for Judge Paul G. Breckenridge. With the
5 exception of six documents which had been marked for
6 identification but not admitted into evidence during the
7 May-June 1984 trial of CSC's case against Armstrong, Ms. Hart
8 returned to Mr. Peterson all of the documents and exhibits
9 originally placed in the custody of the Clerk of the Court at
10 the outset of the litigation.

11 3. On December 17, 1986, I accompanied CSC counsel Timothy
12 Bowles to the Los Angeles Superior Court where we met with Mr.
13 Fred Roeder, the supervisor over the Superior Court archives
14 files. Mr. Roeder informed us that he had been told by his
15 counterpart at the Court of Appeal that the trial exhibits
16 furnished to the Court of Appeal for the then pending appeal
17 were no longer needed, and that those exhibits had been returned
18 to the Superior Court by the Court of Appeal. Mr. Roeder
19 thereupon returned to Mr. Bowles all of the exhibits which had
20 been returned to him by the Court of Appeal along with
21 certified copies of the trial court exhibits for which the
22 originals had been returned the previous day.

23 I declare under penalty of perjury that the foregoing is
24 true and correct.

25 Executed this 13th day of February 1989 in Los Angeles,
26 California.

27 
KENNETH D. LONG

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, California 90028.

On February 13, 1989, I caused to be served the foregoing document described as BRIEF IN OPPOSITION TO MOTION OF BENT CORYDON FOR RETURN OF DOCUMENTS AND FOR INSPECTION OF FIVE SPECIFIC DOCUMENTS MAINTAINED UNDER SEAL on interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Hollywood, California, addressed as follows:

SEE ATTACHED LIST.

If hand service is indicated on the attached list, I caused this to be served by hand, otherwise I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail at Hollywood, California.

Executed on February 13, 1989 at Hollywood, California. .



SERVICE LIST

Toby Plevin
SAYRE, MORENO, PURCELL & BOUCHER
10866 Wilshire Boulevard
Fourth Floor
Los Angeles, CA 90024

HAND DELIVERED

Paul Morantz
Attorney at Law
P.O. Box 511
Pacific Palisades, CA 90272

**HAND DELIVERED AT
P.O. BOX**

Michael Flynn
FLYNN, SHERIDAN & TABB
One Boston Place
26th Floor
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